

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

**v.**

ANGELO MARTIGNETTI, JR.,  
Defendant

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CRIMINAL NO. 05-10131-JLT

**GOVERNMENT'S MOTION FOR A RULE 11 HEARING**

The United States hereby moves for the scheduling of a Rule 11 hearing. As grounds therefor, the government states that the defendant has advised the government and the magistrate court that he intends to change his plea. In addition, the parties anticipate entering a written plea agreement shortly. The government has consulted with Martignetti's attorney and they jointly request a date of October 31, November 3 or some other date thereafter convenient to the Court.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ Mark J. Balthazard  
MARK J. BALTHAZARD  
Assistant U.S. Attorney